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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to File Documents Under Seal portions of Plaintiffs' November 4 Hearing Demonstratives (Dkt. 321). Having considered the motion to seal, supporting declarations, and pleadings on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Plaintiffs' Demonstratives (Dkt. 321-4)	GRANTED as to redacted portions at: Pages 3-6, 11-14, 16, 18-19, 26, 28-33, 42-51	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, cookies, internal identifiers, as well as Google's internal communications and practices with regard to Incognito and its proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's identifier system and practices relating to competing products.

SO ORDERED.

DATED: _____

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge